

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Dametrice Pooler,)	C/A No. 2:19-CV-03347-DCN
)	
Plaintiff,)	
)	
Versus)	
)	DEFENDANTS ALAN WILSON, AS
Alan Wilson, as Attorney General, State of)	ATTORNEY GENERAL, STATE OF SOUTH
South Carolina and South Carolina Law)	CAROLINA AND SOUTH CAROLINA LAW
Enforcement Division (SLED), and John)	ENFORCEMENT DIVISION (SLED)’S
Does 1-10,)	MOTION TO DISMISS, OR IN THE
)	ALTERNATIVE, MOTION FOR SUMMARY
In Re: Forfeiture)	JUDGMENT
Defendants.)	

TO: JEFF BUNCHE, JR., ATTORNEY FOR THE PLAINTIFF:

PLEASE TAKE NOTICE that the Defendants, Alan Wilson, as Attorney General, State of South Carolina and South Carolina Law Enforcement Division (SLED) (hereinafter “these Defendants”), by and through their undersigned attorneys, renew their previously filed motions, pursuant to Rules 12(b)(6), 8(a)(2), and 56, Fed. R. Civ. P., Doc Nos. 002 and 007, with supporting Memorandum Doc No. 008 because Plaintiff’s Second Amended Complaint fails to state a claim upon which relief can be granted or in the alternative, that these Defendants are entitled to judgment as a matter of law. Further, these Defendants pray for all other relief this Honorable Court deems just and proper. This motion is based upon the Federal Rules of Civil Procedure and all applicable authority, including memoranda or affidavits, or other supporting documentation these Defendants have previously filed or may file in support of this Motion.

HOOD LAW FIRM, LLC
172 Meeting Street
Post Office Box 1508
Charleston, SC 29402
Ph: (843) 577-4435 / Fax: (843) 722-1630
Email: Info@hoodlaw.com

s/ Ellore A. Ganes

Robert H. Hood, Jr. (SC #13491)

Ellore A. Ganes (SC #70509)

Alyssa L. Agostino (12960)

Attorneys for the Defendants

*Alan Wilson, as Attorney General, State of South
Carolina and South Carolina Law Enforcement
Division (SLED)*

December 26, 2019

Charleston, South Carolina